IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. GEORGI G. GEVORGYAN a/k/a "George" [DOB: 11/13/1979], All Counts MARAT V. HOVHANNISYAN a/k/a "Mark" [DOB: 10/19/1982], Counts 1-5 Defendants.	No. 14- 3009 - 01/02-CR-S- BCW **COUNTS ONE through SIX:** **31 U.S.C. § 5324(a)(3)** **Structuring Currency Transactions** **Class D Felony** As to Each Count: NMT 5 Years Imprisonment NMT $250,000 Fine Alternative Fine of NMT Twice the Amount of Criminally Derived Property NMT 3 Years Supervised Release $100 Special Assessment Order of Restitution

I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

At all times material and relevant to this Indictment:

COUNTS ONE through SIX

(Structuring a Currency Transaction to Evade Reporting Requirements)

The Defendants

1. Defendants Georgi G. Gevorgyan and Marat V. Hovhannisyan are Armenian nationals. Armenia was formerly a part of the Soviet Union until it became an independent nation in 1991.

2. Defendant Georgi G. Gevorgyan initially entered the United States on a visitor exchange, non-immigrant visa. He is now a lawful permanent resident and has a pending application to become a naturalized United States citizen.

3. Defendant Marat V. Hovhannisyan initially entered the United States on a visitor exchange, non-immigrant visa. Based on an asylum request, he is now a lawful permanent resident and has a pending application to become a naturalized United States citizen.

The Business Operated by the Defendants

4. G.M.H. Advanced Staffing Services, LLC (GMH) was incorporated in the State of Missouri on September 19, 2006. Documents filed with the Missouri Secretary of State's office list defendant Hovhannisyan as the registered agent for GMH while defendant Gevorgyan is listed as one of the corporate organizers of GMH. These same documents state that GMH was organized to provide hotel-related hospitality services and list 2719 W. 76 Country Blvd., Room 207, Branson, Missouri 65616, as the address for GMH.

5. GMH was operated by defendants Gevorgyan and Hovhannisyan as a labor leasing company that supplied laborers and workers to various businesses in and around the Branson, Missouri area. Numerous hotels, restaurants, golf courses, and entertainment venues in the Branson area, many of which are well known, contracted with GMH to have GMH supply them with workers.

6. Many of the workers on GMH's payroll were aliens (non-United States citizens) who were in the United States on temporary work visas. After these aliens arrived in the United States, they became dependent upon GMH for more than a paying job. For example, GMH required the aliens to be housed in certain hotels and apartments in the Branson area, creating a situation where the workers had to make a rent payment to GMH. These aliens were also dependent on GMH to ferry them from their living quarters to their jobs in the Branson area. To this end, the alien workers were picked up and transported to work in vans operated by GMH. The manner in which the defendants treated the aliens they employed was reminiscent of the

now discarded and rejected way in which "company towns" were operated in the United States in the early days of the industrial revolution.

7. Workers often ended up with large debts owed to the defendants which the defendants deducted from workers' paychecks, leaving the workers with minimal take home pay. The defendants routinely allowed the alien workers to remain on the payroll following expiration of their temporary work visa. The defendants collected fees from the alien workers based on the promise that the defendants would obtain extensions of the temporary work visa, but routinely failed to do so, leaving the alien workers in an illegal employment status. The defendants then used the alien workers' illegal employment status, and the threat of potential removal and deportation from the United States, as a way to compel the alien to continue working for the defendants.

8. In addition to employing aliens who were in the United States on temporary work visas, the defendants also employed undocumented aliens who were not even legally entitled to be in the United States, much less be employed.

9. On or about the evening of November 3, 2010, following the execution of a federal search warrant at the business premises of GMH on the morning of November 3, 2010, defendant Gevorgyan spoke to an alien working for GMH that defendant Gevorgyan knew was working unlawfully in the United States, and told the alien to stop working and hide in the worker's room until defendant Gevorgyan gave the alien further instructions.

10. On or about November 5, 2010, a third person acting at the direction of defendants Gevorgyan and Hovhannisyan, came to the hotel room where the alien had been hiding for two days as directed by defendant Gevorgyan. The third person paid the alien $500 cash in hundred dollar bills, and told the alien that was the alien's final paycheck.

The Charge

11. Defendants Georgi G. Gevorgyan and Marat V. Hovhannisyan were the authorized signatories on the account of defendant GMH at Ozark Mountain Bank, a domestic financial institution within the meaning of Title 31, United States Code, Section 5324.

12. In 2009 and 2010 GMH received in excess of $1.5 million and in excess of $1.8 million, respectively, from various Branson area hotels, restaurants, and businesses, which sums represented payments from said hotels, restaurants, and businesses for the workers provided to them by GMH, and these sums were in turn deposited into GMH's bank account.

13. On or about the below listed dates, within the Western District of Missouri and elsewhere, defendants Georgi G. Gevorgyan and Marat V. Hovhannisyan, for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and the regulations promulgated thereunder, did knowingly and willfully structure, attempt to structure, and assist in structuring, a currency transaction, in that said defendants made cash withdrawals from the indicated domestic financial institution for the purpose of engaging in currency transactions in amounts of $10,000 (Ten thousand dollars) or less and did thereby evade and defeat, and attempt to evade and defeat, the duty to file a Currency Transaction Report.

Count	Dates and Defendants	Financial Institution	Total Amount Subject to Structured Withdrawals	Number of Cash Withdrawals under $10,000
1	December 5, 2009 Georgi G. Gevorgyan Marat V. Hovhannisyan	Ozark Mountain Bank	$14,000.00	2
2	November 3, 2010 Georgi G. Gevorgyan Marat V. Hovhannisyan	Ozark Mountain Bank	$18,450.00	2

Count	Dates and Defendants	Financial Institution	Total Amount Subject to Structured Withdrawals	Number of Cash Withdrawals under $10,000
3	November 6, 2010 Georgi G. Gevorgyan Marat V. Hovhannisyan	Ozark Mountain Bank	$19,320.00	2
4	November 8, 2010 Georgi G. Gevorgyan Marat V. Hovhannisyan	Ozark Mountain Bank	$15,875.00	2
5	November 13, 2010 to November 15, 2010 Georgi G. Gevorgyan Marat V. Hovhannisyan	Ozark Mountain Bank	$16,755.00	3
6	December 23, 2010 to December 24, 2010 Georgi G. Gevorgyan	Ozark Mountain Bank	$19,300.00	2

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5311(a), and Title 31, Code of Federal Regulations, Section 103.11, and Title 18, United States Code, Section 2.

A TRUE BILL.

/s/James Washington
FOREPERSON OF THE GRAND JURY

/s/Teresa A. Moore
Teresa A. Moore
Assistant United States Attorney

/s/Phillip Eugene Porter
Phillip Eugene Porter
Deputy United States Attorney

Dated: 2/18/2014
Kansas City, Missouri